



HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

Iesha Sumerall Eromosele  
Special Assistant Corporation Counsel  
Office: (212) 356-0873

October 30, 2023

**VIA ECF**

Hon. Colleen McMahon  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, New York 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 10/31/2023

*Initial Conference*  
*adjourned to 11/7/2023*  
*at 10.00 AM.*

Re: C.S. et al. v. N.Y.C. Dep't of Educ., 23-cv-6294 (CM)(SLC)

Dear Judge McMahon:

I am a Special Assistant Corporation Counsel in the Office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiffs seek attorneys' fees, costs, and expenses for legal work performed on administrative proceedings, as well as for this action, pursuant to the Individuals with Disabilities Education Act ("IDEA"). 20 U.S.C. § 1400, *et seq.*

I write to respectfully request an adjournment of the Initial Conference, currently scheduled for November 2, 2023 (*see* ECF No. 5), to December 4, 2023, or a date thereafter convenient for the Court. This is the first joint request for an adjournment of the Initial Conference. Plaintiff consents and joins in this request. The requested extension is intended to provide Defendant time to complete its internal review of Plaintiff's attorney billing records, engage with Plaintiff in settlement discussions, and then hopefully resolve this fees-only matter. Defendant has fully resolved all but a few of similar IDEA fees actions brought by plaintiffs represented by The Law Office of Steven Alizio, PLLC without the need to burden the Court with any conferences or motion practice, and we expect this matter to follow the same course.

Accordingly, Defendant respectfully requests that the Initial Conference be adjourned to December 4, 2023 or a date thereafter convenient for the Court.

Thank you for considering this request.

Respectfully submitted,

/s/ Iesha Sumerall Eromosele

Iesha Sumerall Eromosele, Esq.  
Special Assistant Corporation Counsel

cc: Steven Alizio, Esq. (via ECF)